

Anita Y. Milanovich (Mt. No. 12176)
THE BOPP LAW FIRM, PC
1627 West Main Street, Suite 294
Bozeman, MT 59715
Phone: (406) 589-6856
Email: aymilanovich@bopplaw.com
Local Counsel for Plaintiffs

James Bopp, Jr. (Ind. No. 2838-84)*
Jeffrey Gallant (Va. No. 46876)**
Courtney E. Turner (Ind. No. 32178-29)***
THE BOPP LAW FIRM, PC
The National Building
1 South Sixth Street
Terre Haute, Ind. 47807
Phone: (812) 232-2434
Fax: (812) 235-3685
Email: jboppjr@aol.com
jgallant@bopplaw.com
cturner@bopplaw.com
Counsel for Plaintiffs

*Motion pro hac vice granted 9/9/11.

**Motion pro hac vice granted 6/11/12.

***Motion pro hac vice granted 2/1/16.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION

Lair, et al.,

Plaintiffs,

v.

Jonathan Motl, et al.,

Defendants.

Case No. 6:12-cv-00012-CCL

**Declaration of Anita Y.
Milanovich In Opposition to
Defendants' Motion for
Summary Judgment**

I, Anita Y. Milanovich, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a resident of Bozeman, Montana, and an attorney for Plaintiff in this matter. I am over eighteen years of age and my statements herein are based on personal knowledge.
2. The documents attached to Plaintiffs' memorandum opposing Defendants' Motion for Summary Judgment are true and accurate copies.
3. I personally interviewed, in person or by phone, each of the nine candidates the Commission alleges engaged in quid pro quo corruption. I also interviewed Mr. Lefer, who is alleged to represent or act on behalf of numerous corporate entities and who is the person with whom Commissioner Motl alleges these nine candidates engaged in quid pro quo arrangements. Each of these ten individuals were interviewed independently and, when applicable, with either their attorney present or with their attorney's express consent.

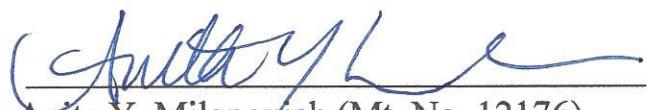
4. Mr. Boniek, one of the nine candidates, is in Europe. So while I have made every effort to secure his review and signature for his declaration over the past week and a half, it has been impossible to do so by the April 4, 2016, filing deadline for Plaintiffs' response brief. He is expected to return within the next few

**Declaration of
Anita Y. Milanovich
Opposing Summary
Judgment**

days, so I expect to be able to file it no later than the reply deadline of April 11, 2016.

5. So as not to prejudice the Commission's preparation of any reply brief and as a gesture of good faith, I attest that the expected written testimony of Mr. Boniek will be substantially similar to and materially the same in all relevant respects to the other eight candidate declarations furnished to this Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 4, 2016.



Anita Y. Milanovich (Mt. No. 12176)
THE BOPP LAW FIRM, PC
1627 West Main Street, Suite 294
Bozeman, MT 59715
Phone: (406) 589-6856
Email: aymilanovich@bopplaw.com
Attorney for Plaintiffs

Certificate of Service

I hereby certify that the foregoing document was served on April 4, 2016, upon the following counsel via the United States District Court for the District of Montana, Helena Division, electronic filing system:

TIMOTHY C. FOX
Montana Attorney General
DALE SCHOWENGERDT
State Solicitor
MATTHEW T. COCHENOUR
PATRICK RISKEN
Assistants Attorney General
215 North Sanders
P.O. Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
Fax: 406-444-3549
dales@mt.gov
mcochenour2@mt.gov
prisken@mt.gov
Attorneys for Defendants

/s/ Anita Y. Milanovich
Anita Y. Milanovich

**Declaration of
Anita Y. Milanovich
Opposing Summary
Judgment**